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7 8	BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF WASHINGTON
9	In the Matter of the Application regarding OIC Docket No. G02-45 the Conversion and Acquisition of Control
10	of Premera Blue Cross and its Affiliates REQUEST FOR PRODUCTION OF CONSULTANTS' DRAFT
11	REPORTS AND PREMERA'S RESPONSES THERETO
12	
13	Pursuant to the Fifteenth Order: Ruling on Disclosure of OIC's Draft Consultant
14	Reports to the Interveners issued by the Insurance Commissioner on October 3, 2003, the
15	Washington State Medical Association hereby requests production from Premera of the
16	OIC Consultants' draft reports identified in the OIC Staff's Notice of Submission of
17	Consultants' Draft Reports submitted on October 3, 2003.
18 19	DATED this sixth day of October, 2003.
20	Respectfully submitted,
21	COOPERSMITH HEALTH LAW GROUP
22	P.S.
23	By\S\
24	Jeff Coopersmith, WSBA # 20913 Attorney for Washington State Medical
25	Association Association

REQUEST FOR PRODUCTION OF CONSULTANTS' DRAFT REPORTS AND PREMERA'S RESPONSES THERETO -- 1

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Premera's Response To Washington State Medical Association's Request:

Premera will produce two versions of the draft consultant reports and executive summaries submitted to Premera by the OIC Staff. The first, an Attorneys' Eyes Only ("AEO") version, will retain the full text of the original draft but with AEO material and confidential material bracketed in the margins. AEO material will be entirely redacted from the second version of each report, which will be marked Confidential.

The designation of portions of the documents as AEO or Confidential is done pursuant to the Commissioner's Eighth Order: Protective Order. Further, these documents are subject to the portion of the Commissioner's Fifteenth Order that requires the entire draft reports and summaries to be treated as Confidential by the parties.

Premera expects that counsel will (1) limit copies of the reports and account for them, (2) distribute copies only as authorized by the protective order, and (3) remind all recipients that the protective order applies. Premera anticipates that any disclosure of AEO material or confidential material will be done under the strict terms of the confidentiality agreement incorporated in the protective order. AEO information may not be disclosed to any person other than those specified in subparagraph 3(b)(i) of the protective order without full compliance with the procedures set forth in subparagraph 3(b)(ii) including but not limited to the written notice and service of signed Appendix A declaration preceding any such disclosure.

DATED this 10th day of October, 2003.

PRESTON GATES & ELLIS LLP

Thomas E Ka

Thomas E. Kelly, Jr., wsba # 05690 Robert B. Mitchell, wsba # 10874 Attorneys for PREMERA and Premera

Blue Cross

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